OTA RESOURCES

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TURA Program Implementation

The TURA Program is co-implemented by:

- The Massachusetts Department of Environmental Protection
- The Toxics Use Reduction Institute at UMass Lowell
- The Massachusetts Office of Technical Assistance

MassDEP

Regulatory

OTA

Confidential Technical Assistance

TURI

Research & Grants

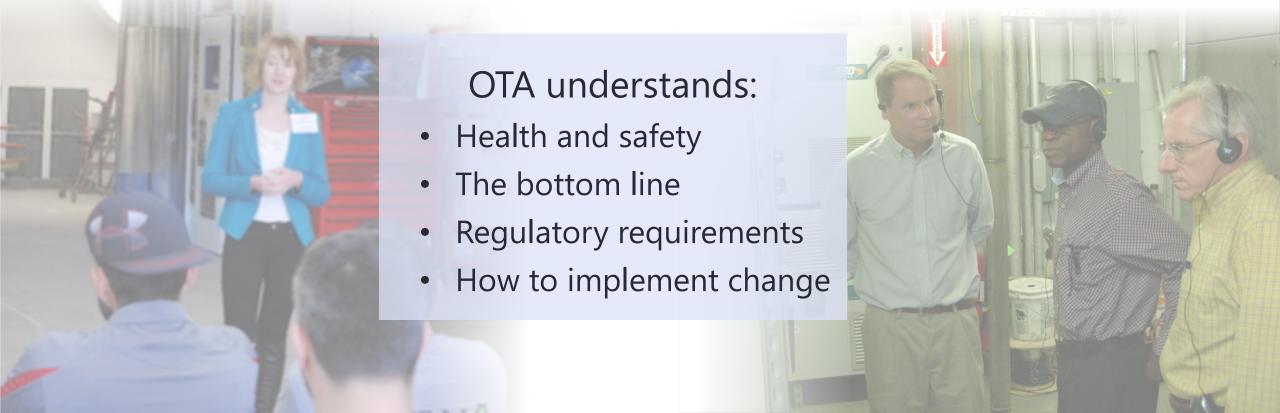
Office of Technical Assistance (OTA)

- Non-regulatory agency
- Provides free, confidential technical and compliance assistance to MA businesses that use toxic substances
- Gives concrete recommendations for toxics reduction and resource conservation

OTA has conducted 3,500 site visits at 1,500 facilities, reducing **millions of pounds** of toxic chemicals and **millions of dollars** in operating costs.

OTA Staff

- Chemists, engineers, and public health professionals
- Hands-on manufacturing experience



Obstacles for Companies

Lack of company awareness

PFAS not listed on SDS Confidential Business Information (CBI) Tainted incoming feedstock

Regrettable substitution

'Shorter-chain' is still a 'forever chemical'

Fear of liability

Other PFAS sources = misplaced liability

Lack of regulation

What to look for

Check SDS (see examples)

Keywords to look for terms such as 'fluoro', 'PFxx', 'fluorinated', 'HF is a decomposition product'

De minimis = 1% for all PFAS except PFOA (<0.1%). Applications where PFAS are likely to be present less than 1% include surfactants, processing aids

Testing is not required, but is an option

Identifying PFAS Use in Your Facility

Look for common uses of PFAS

Check available CAS numbers against reportable definition

Send a notification letter to your chemical or product supplier

Contribute to developing product list

- Common uses include textile coatings (e.g., water-repellency), surfactants, degreasing (e.g., solvents), metal finishing (e.g., fume suppressants), polymers and resins, and AFFF
- Check your SDSs for products likely to contain PFAS
- Note listings described as Confidential Business Information (CBI) or proprietary as items of concern – contact your supplier or <u>OTA</u> for help
- Review <u>draft TURA guidance</u> and use reportable definition to check CAS # against <u>existing databases</u>
- Paper and metal finishing industries, contact OTA to take survey
- If no CAS numbers are available for fluorinated compounds, contact your supplier or <u>OTA</u> for technical assistance
- Use OTA's template to notify your supplier
- Involve your purchasing department in this effort
- Keep records to demonstrate good faith effort
- The TURA program is developing a list of products confirmed to contain PFAS
- If your supplier notifies you of products containing PFAS, please share this information with OTA/TURI

PFAS Identification: Supplier Notification Letter

OTA has developed a supplier notification letter (template in handouts) that companies can use to request information from their suppliers about PFAS reportable under TRI and TURA.

TRI Listed

Legal
Obligation to
Disclose

TURA Listed

No Legal Obligation to Disclose

Resources for Companies: PFAS Product List

TURI research

Existing informational lists

List of PFAScontaining products

(in development)

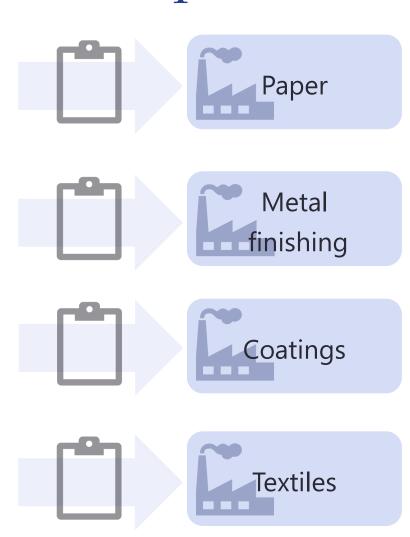
OTA outreach

TURA filer input

- Once developed, product list made available to help companies avoid PFAS-containing products
- May highlight applications where safer alternatives still need to be identified

Resources for Companies: PFAS Identification

Assessments to identify PFAS sources (several in development)



- OTA technical staff flag likely sources of PFAS
 - Companies may share list of CAS numbers with OTA
- OTA and TURI pursue research on products of concern
- Companies may opt to share product information with OTA to populate a list of PFAS-containing products

OTA Technical Assistance

- OTA can assist facilities with:
 - Toxics use reduction
 - Environmental compliance
 - Energy efficiency
 - Resource conservation
- Both onsite and remote assistance are available
- After a site visit, OTA delivers

 a report with tailored recommendations



Frequently Asked Questions about OTA

Is OTA's work truly confidential?

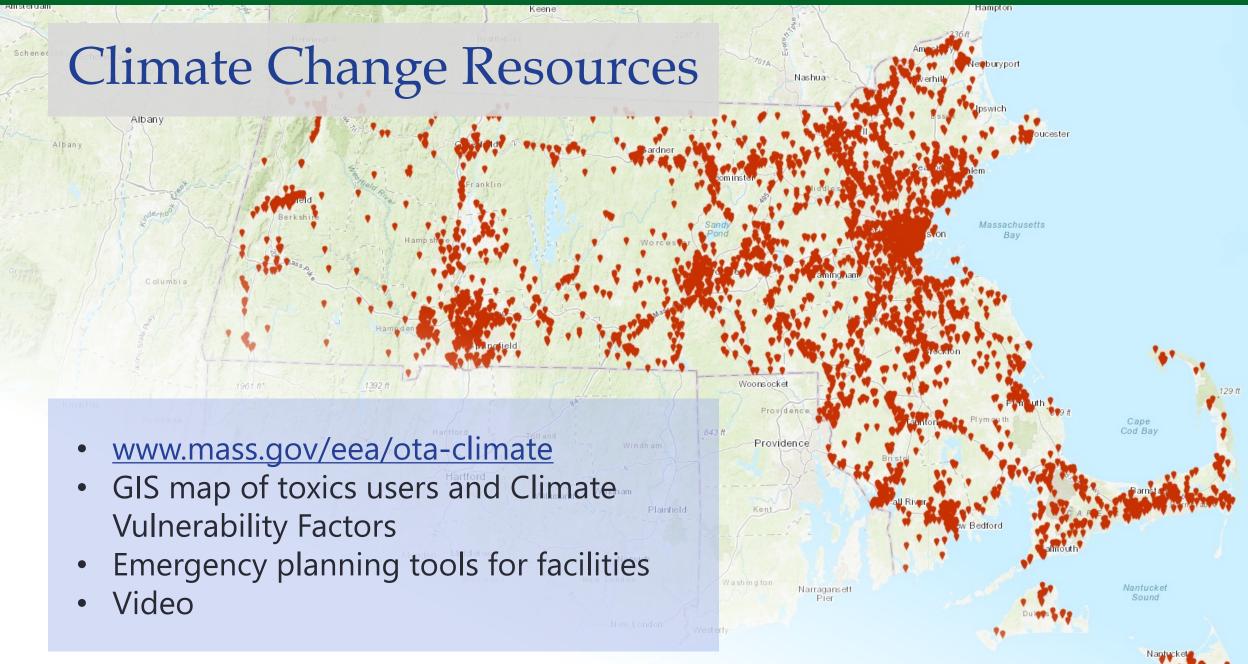
Yes. OTA will **never** disclose anything about your company—not even that we worked with you—without your written permission.

What if I'm out of compliance with laws or regulations?

Then we'll help you get in compliance. We can't and won't report any violations.

What kinds of work has OTA done before?

Some companies have given us permission to talk about how we've helped them. Visit mass.gov/ota to see our case study library.



5/25/22 Climate Change / Chemical Safety Training

The New England Consortium is delivering a 3-hour virtual, no-cost course that includes the intensifying climate crisis extreme weather events and chemical safety in companies and communities; state and federal requirements for hazardous materials; emergency planning (including risk management plans); and building resilience within communities and organizations and at the individual level. This course is intended for municipal organizations, companies, public emergency responders, non-profit institutions, and community organizations.

Presenters are from TNEC and the Massachusetts Office of Technical Assistance.

Register online for the May 25 course.

MA Office of Technical Assistance

Contact Us

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